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April 29, 2025

VIA ECF

Hon. Brenda K. Sannes, Chief U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse NY 13261-7336

Re: Alaei v. SUNY Albany Northern District of New York 21-CV-377 (BKS/TWD)

Dear Judge Sannes:

Pursuant to this Court's Trial Order dated June 17, 2024 (Doc 93), the Plaintiff, Dr. Kamiar Alaei, hereby provides the Court with its proposed non-videotaped deposition transcripts to be used at Trial in this matter, which is scheduled to commence at 9:30 AM on May 27, 2025.

Relative to depositions that were conducted in this matter, the Plaintiff proposes to use the following at Trial:

- Deposition transcript for Bruce P. Szelest from July 19, 2023. A copy is available in the Record at Declaration of David C. White (Doc 75-2) at Ex. B (Doc 75-4).
- Deposition transcript of James R. Stellar, conducted on July 20, 2023. A copy of which is available in the Record at Declaration of David C. White (Doc 75-2) at Ex. C (Doc 75-5).
- Deposition transcript of Havidan Rodriguez, conducted on August 2, 2023, a copy of which is available at Declaration of David C. White (Doc 75-2) at Ex. E (Doc 75-7).
- Deposition transcript of Brian Selchick, conducted on August 24, 2023, a copy of which is available with the Declaration of David C. White (Doc 75-2) at Ex. F (Doc 75-8).

Relative to depositions conducted in the related New York State Court of Claims Lawsuit between Plaintiff and the State of New York, based upon employment issues between Plaintiff and the State University of New York at Albany, (*Alaei v State of New York* [New York State Court of Claims Claim No. 132554] [Hon. Frank P. Milano]), the Plaintiff will also be using the following deposition transcripts at Trial:

- The deposition transcript of Brian Selchick, conducted on April 9, 2021, a copy of which is attached hereto as **Exhibit A**.
- The deposition transcript of Bruce Szelest, conducted on April 12, 2021, a copy of which is attached hereto as **Exhibit B**.
- The deposition transcript of Dr. Harvey Charles, conducted on January 13, 2021, a copy of which is attached hereto as **Exhibit C**.
- The deposition transcript of Havidan Rodriguez, conducted on April 12, 2021, a copy of which is attached hereto as **Exhibit D**.
- The deposition transcript of James Stellar, conducted on April 9, 2021, a copy of which is attached hereto as **Exhibit E**.
- The deposition transcript of Dr. Kevin Williams, conducted on January 13, 2021, a copy of which is attached hereto as **Exhibit F**.
- The deposition transcript of Randy Stark, conducted on March 24, 2021, a copy of which is attached hereto as **Exhibit G**.
- The deposition transcript of William B. Hedberg, conducted on January 25, 2021, a copy of which is attached hereto as **Exhibit H**.

In addition to the above deposition transcripts, the Plaintiff also plans on introducing relevant portions of the Trial Transcript, occurring on June 6, 2022 through June 8, 2022 from the Trial before the New York State Court of Claims. The New York State Court of Claims Trial Transcript from the Trial from June 6 to June 8, 2022, was previously included as part of the Plaintiff's Declaration of Joseph F. Castiglione in Opposition to Defendant's Motion for Summary Judgment (Doc 83-1) and was included as part of Ex. B (Doc 83-3). For the Court's convenience, a copy of the June 6-8, 2022 Trial Transcript from the New York State Court of Claim lawsuit is attached hereto as **Exhibit I**.

Please let me know if you have any questions.

Respectfully submitted,

Joseph F. Castiglione

Enclosures

cc: David C. White, Esq. (Via ECF)